

Ickes has explained his view that there is and should be “a very, very close working relationship . . . between the White House and the agencies” in order to implement the President’s policies.³⁰⁰ Ickes also insisted, however, that he was not routinely involved in Interior Department policy matters, and that his attention to substantive matters generally was driven by issues the Chief of Staff asked him to handle, not a relationship of oversight or responsibility for any particular agency. Ickes said he was not Secretary Babbitt’s “boss,” and the Interior Secretary did not report or answer to Ickes in the performance of his routine functions.³⁰¹ Moreover, Ickes stated that Fowler asked him to do nothing but make a “status check” on the Hudson matter, and that he did nothing more.³⁰²

Fowler wrote a memorandum to Ickes on May 5, 1995, to “follow up our conversation regarding the Hudson Wisconsin Casino proposal.” In the memo, Fowler provided Ickes with “an outline of the issues raised during my meeting with several tribal leaders and DNC supporters who oppose the project,” and attached an economic study given to Fowler by “our supporters.”³⁰³ Fowler asked Ickes to “[p]lease let me know how we might proceed,” and thanked Ickes for his attention.³⁰⁴

³⁰⁰Ickes G.J. Test. at 49-50.

³⁰¹*Id.* at 38-39.

³⁰²*Id.* at 146-47, 268. Ickes initially stated that Fowler only implicitly requested a report on the status of the matter, but then testified that Fowler asked that Ickes “get back to” Fowler after checking into the matter. *Id.* at 147.

³⁰³Fowler stated that his use of the word “supporters” includes financial support of the DNC as well as general support. Ickes stated that the nature of support from the interested party would have no bearing on how he would respond to such a request.

³⁰⁴No copy of Fowler’s memorandum to Ickes concerning Hudson was produced by the White House, but multiple copies were produced from DNC files. Ickes thinks Fowler sent him
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